

Attorney Name, Address, Telephone & FAX Numbers, State Bar Number & Email Address Rabin Pournazarian, SBN 186735 Price Law Group, APC 6345 Balboa Blvd., Suite 247 Encino, CA 91316 (818) 995-4540 Telephone (818) 995-9277 Facsimile rabin@pricelawgroup.com	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION	
In re: Eliset Pantoja	CASE NUMBER: 8:18-bk-13785-MH CHAPTER 13
Debtor(s).	APPLICATION OF ATTORNEY FOR DEBTOR FOR ADDITIONAL FEES AND RELATED EXPENSES IN A PENDING CHAPTER 13 CASE SUBJECT TO A RIGHTS AND RESPONSIBILITIES AGREEMENT (RARA) [11 U.S.C. § 330(a)(4)(B); LBR 3015-1(v)(2)]

TO DEBTOR, CHAPTER 13 TRUSTEE, AND PARTIES IN INTEREST:

- 1. Rights and Responsibilities Agreement.** The undersigned Attorney and Debtor are parties to a Rights and Responsibilities Agreement (RARA) filed as docket number 3 .
- 2. RARA Fee Agreement** Pursuant to the RARA, Debtor agreed to pay Attorney (i) a flat fee of \$ 5,000.00 for those services identified in boldface type in the RARA (Basic Services) and (ii) an hourly fee of \$ 525.00 per hour, or a reasonable flat fee, for services other than the Basic Services (Additional Services).

(If the RARA contains any other or different provisions regarding fees for Additional Services, Attorney must (i) check this box ☐ and (ii) attach an addendum providing the details.)

- 3. Request for Additional Fees.** Pursuant to 11 U.S.C. § 330(a)(4)(B) and LBR 3015-1(v)(2), Attorney requests allowance and payment of the following:

Fees for Additional Services	\$ <u>350.00</u>
Expenses related to Additional Services	\$ <u>0.00</u>
Total	\$ <u>350.00</u>

*"Bankruptcy Code" and "11 U.S.C." refer to the United States Bankruptcy Code, Title 11 of the United States Code.
"FRBP" refers to the Federal Rules of Bankruptcy Procedure. "LBR" and "LBRs" refer to the Local Bankruptcy Rule(s) of this court.*

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

4. **Case Status.** This Chapter 13 case has not been dismissed or converted.

5. **Plan Status.**

- ☒ A Chapter 13 Plan was confirmed in this case by order entered as docket number 27 .
- ☐ A Chapter 13 Plan has not yet been confirmed in this case; a hearing is set for (date) _____ .

6. **Fee Award for Basic Services.**

- ☒ Attorney was awarded fees for Basic Services in the amount of \$ 5,000.00 in the order confirming the plan and/or a separate order of the court.

7. **Prior Applications for Additional Fees.**

- ☐ Attorney has not previously applied for Additional Fees in this case.
- ☒ Attorney has previously applied for Additional Fees in this case. A total of \$ 3,525.00 has been awarded to Applicant for Additional Fees pursuant to prior requests.
- ☐ One or more applications for Additional Fees in this case are pending. See docket number(s). _____.
- A total of \$ _____ in Additional Fees has been requested pursuant to those pending applications.

8. **Disclosure of Amounts Previously Paid To Attorney.** Pursuant to LBR 3015-1(v)(2), Attorney discloses the following amounts paid to date (including prepetition payments) by Debtor or the Chapter 13 Trustee to Attorney and the source of those payments:

Date Received	Amount Received	Source of Payment
	\$ 490.00	Debtor
	\$ 8,035.00	Trustee
TOTAL	\$ 8,525.00	

9. **Amount and Basis for Compensation Requested.**

- A. ☒ Presumptively Reasonable Fees (No Look Fees). Attorney requests an award of fees for Additional Services identified in the following table; these amounts are equal to or less than the maximum No Look Fee specified in Section 2.9(b) of the Court Manual for those services.

(If you are requesting fees for more than one instance of the same type of service, you must provide the pertinent details in the "Explanation" box or in an addendum.)

Fee Requested	Maximum No Look Fee	Legal Service	Docket No.
\$	\$750.00	Unopposed motion to extend/impose automatic stay	
\$	\$350.00	Unopposed application for order shortening time	
\$	\$1,250.00	Unopposed motion to avoid lien (11 U.S.C. § 506(a))	
\$	\$1,500.00	Unopposed motion to avoid lien (11 U.S.C. § 506(a)), with stipulation and order	

\$	\$750.00	Unopposed motion to avoid lien (11 U.S.C. § 522(f))	
\$	\$950.00	Unopposed motion to disallow claim	
\$350.00	\$350.00	Opposition to Chapter 13 Trustee's motion to dismiss or convert case	105
\$	\$750.00	Unopposed motion to modify plan	
\$	\$750.00	Unopposed motion to refinance/sell real property	
\$	\$750.00	Unopposed motion to incur debt	
\$	\$300.00	Application for order confirming that loan modification discussion does not violate the automatic stay	
\$	\$2,000.00	Complaint to avoid lien	
\$	\$2,500.00	Loan Modification Management Fees and Costs	
\$350.00		Total Requested	

B. ☐ Hourly or Other Additional Fees. Attorney requests an award of fees for Additional Services on an hourly or other basis.

a. Dates during which the Additional Services were provided: from (*dates*) _____ to _____.

b. Summary of hourly fees requested for the Additional Services.

Name	Attorney or Paralegal?	Hourly Rate	Hours Billed	Total Requested
		\$		\$
		\$		\$
		\$		\$
		\$		\$
		\$		\$
TOTAL				

c. Description of the nature, necessity, and results of the Additional Services for which hourly fees are requested in this Section 10.B: (Check here ☐ if an addendum containing additional information is attached.)

d. A billing statement is attached as Exhibit A, identifying each service performed, the service provider, the date rendered, the time spent, and the amount billed (*required*).

- e. If fees for the Additional Services are requested other than on an hourly basis, the amount requested and the basis for that request are as follows:

10. Expenses. Attorney requests an award of expenses incurred in connection with the Additional Services in the amounts summarized in the following table.

Expense Category	Amount Requested
	\$
	\$
	\$
	\$
	\$
	\$
	\$
TOTAL	\$

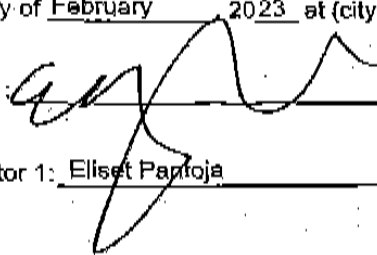
Additional Explanation: (Check here ☐ if an addendum containing additional information is attached.)

(Note: If you are requesting the allowance of expenses related to No Look Fee services, you must explain above why the requested expenses are extraordinary.)

11. Request for Payment.

- ☒ Attorney requests that all fees and expenses allowed hereunder be awarded and paid by the Chapter 13 Trustee through the plan that has been or may be confirmed in this case.
- ☐ Attorney requests that the fees and expenses allowed hereunder be awarded and paid in the following manner *(specifically describe the proposed source(s) of payment and the proposed timing of that payment):*

12. Consent and Declaration of Debtor.

CONSENT AND DECLARATION OF DEBTOR(S)	
The undersigned Debtor declares that s/he has reviewed the foregoing Application and consents to approval of payment of the fees and expenses requested by Attorney.	
Executed this <u>2</u> day of <u>February</u> , <u>2023</u> at (city) <u>Costa Mesa</u> (state) <u>CA</u>	
Signature of Debtor 1:	
Printed name of Debtor 1:	<u>Eliset Pantoja</u>
Signature of Debtor 2:	_____
Printed name of Debtor 2:	_____

13. Certifications of Counsel.

a. **No Prior Request.** I certify that Attorney has not previously requested fees or expenses for any of the Additional Services that are the subject of this Application. If I cannot make this certification, I have checked this box ☐ and attached an addendum that discloses the details of that prior request.

b. **No Debtor Consent and Declaration.** If Debtor has not executed the Consent and Declaration in Paragraph 12, the reason Debtor has not done so is as follows:

c. **True and Correct.** I certify that the information contained in and attached to this Application is true and correct.

Date: 3/7/2023

Respectfully submitted,

/s/ Rabin J. Pournazarian

Signature of Attorney for Debtor

Rabin J. Pournazarian

Printed name of Attorney for Debtor

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
6345 Balboa Blvd., Suite 247, Encino, CA 91316

A true and correct copy of the foregoing document entitled (*specify*): Application of Attorney for Debtor for Additional Fees and Related Expenses in a Pending Chapter 13 Case Subject to a Rights and Responsibilities Agreement (RARA) will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 3/7/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

CH. 13 TEE: Amrane (SA) Cohen (TR) efile@ch13ac.com
ATTORNEY FOR DEBTOR: Rabin J Pournazarian enotice@pricelawgroup.com,
rabin@pricelawgroup.com;r43354@notify.bestcase.com
ECF PARTY: Valerie Smith claims@recoverycorp.com
US TEE: United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL:

On (*date*) 3/7/2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR:
Eliset Pantoja
1555 Mesa Verde Drive East
Apt. 027C
Costa Mesa, CA 92626

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

3/7/2023
Date

Roxana Reyes
Printed Name

Roxana Reyes
Signature